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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal information in its August 25, 2017 Opposition to Otto Trucking’s Motion to Compel a Sworn  
8 Statement (the “Administrative Motion”). The Administrative Motion seeks an order sealing the  
9 following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 5 to Waymo’s Opposition	Portions highlighted in green	Waymo
Exhibit 8 to Waymo’s Opposition	Entire document	Waymo
Exhibit 9 to Waymo’s Opposition	Portions highlighted in green	Waymo
Exhibit 10 to Waymo’s Opposition	Entire document	Waymo

16 3. Portions of Exhibit 5 contain, discuss, or refer to Waymo’s confidential business  
17 information, including descriptions of internal Google security tools used to detect and investigate  
18 potential malfeasance. Exhibit 8 is a document containing comprehensive investigative steps taken by  
19 Google’s security engineers. Information about Google’s security tools and investigative steps would  
20 give malicious actors information on how to thwart or evade Google security.

21 4. In Exhibit 9, certain names not relevant to the disposition of Waymo’s Opposition are  
22 sealed to protect privacy interests.

23 5. Exhibit 10 is a collection of documents that Waymo has produced in this litigation,  
24 designated as HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY under the protective order.  
25 These documents include documents from Google’s internal, Google-only intranet server, and from  
26 Google’s internal, Waymo-only website, which includes Waymo’s highly confidential business  
27 strategy and planning. Public disclosure of this information to Waymo’s competitors would harm  
28

1 Waymo by giving its competitors access to Waymo's highly confidential internal business thinking.  
2 Waymo's request to seal is narrowly tailored to only the confidential information.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
4 true and correct, and that this declaration was executed in San Francisco, California, on August 25,  
5 2017.

6 By /s/ Lindsay Cooper  
7 Lindsay Cooper  
8 Attorneys for WAYMO LLC

9  
10 **SIGNATURE ATTESTATION**

11 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
12 filing of this document has been obtained from Lindsay Cooper.

13 /s/ Charles K. Verhoeven  
14 Charles K. Verhoeven